

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

| | | |
|-------------------------------|---|-----------------------|
| In Re: |) | |
| |) | |
| SKS CONSTRUCTION, INC. |) | Case No. 21-31862-KLP |
| |) | |
| Debtor |) | Chapter 11 |
| |) | |
| |) | |
| SKS CONSTRUCTION, INC |) | |
| |) | |
| |) | |
| Plaintiff |) | |
| v. |) | Adversary Proceeding |
| |) | |
| GARDNER STATION, LLC |) | 21-03097-KLP |
| |) | |
| Defendant |) | |
| |) | |

DEFENDANT’S PROPOSED TRIAL EXHIBITS AND DESCRIPTIONS

| Exhibit Letter | Description |
|----------------|--|
| A | Scope of Work by SKS as site contractor to Seller Gardner Station |
| B | SH Partners Final Project Financial Review |
| C | Aug 1, 2017 Email chain Chris Hornung with R. Hauser, purchaser rep, re: site delays with attachment |
| D | SKS Pay Apps 1 and 2 |
| E | SKS Pay App #3 |
| F | SKS Pay App #4 |
| G | Dec 27, 2017 Email from Steve Zuchoski to Chris Hornung with file attachments |
| H | Jan 25, 2018 email Hornung to R. Hauser, regarding completion schedule etc. w/ attachments |
| I | KS Feb 8, 2018 Final Lien Waiver and subcontractor releases |

| Exhibit Letter | Description |
|----------------|--|
| J | April 24, 2018 SKS Project Cost Arithmetic |
| K | June 7, 2018 Closeout costs email To C. Hornung and Jones from Purchaser |
| L | June 20, 2018 C. Hornung Memo to J Honaker and S Jones on Delays and Damages |
| M | June 26, 2018 Honaker Escrow Release Closeout Request |
| N | Steve Jones Email compendium of contract issues with SKS |
| O | Sept 12, 2017 Email C. Hornung to K Carlson for Purchaser on delays |
| P | July 12, 2018 email C Hornung to SKS on Possible Payment to SKS |
| N/A | Any of Plaintiff's Exhibits |

Respectfully submitted,

GARDNER STATION LLC by
S H. PARTNERS LLC, Indemnitor

Dated: April 12, 2022

By: /s/ W. R. Baldwin, III
Of Counsel

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CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing pleading was served by the ECF procedures of this Court April 12, 2022 on all parties hereto subject to such procedures.

_____/s/ W. R. Baldwin, III_____